

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
v.)
) No. 3:22-mj-01033
)
DANIEL SILVA)
a/k/a “Daniel Kelter”)

**UNITED STATES’ MOTION FOR A DETENTION HEARING
AND FOR DETENTION OF THE DEFENDANT**

COMES Now the United States of America by Mark H. Wildasin, United States Attorney, and Rascoe Dean, Assistant United States Attorney, and moves this Court for detention of the Defendant Daniel Silva a/k/a “Daniel Kelter” (the “defendant”) under 18 U.S.C. § 3142(f)(1)(A). For cause, the United States submits that the defendant is charged in the Criminal Complaint with making threats in interstate commerce, in violation of 18 U.S.C. § 875(c), a violation that is a crime of violence under the Bail Reform Act. *See, e.g., United v. Cooper*, 2019 WL 4259454, at *3 (M.D. Tenn. Sept. 9, 2019) (J. Newbern) (“Communicating a threat in violation of 18 U.S.C. § 875(c) constitutes a “crime of violence” for purposes of the Bail Reform Act.”).

As noted in the Criminal Complaint, the defendant has been harassing Victim 1 and Victim 1’s representatives since 2017. The defendant has traveled to Victim 1’s family’s home in the Middle District of Tennessee on at least three occasions since 2018, and he was arrested at Victim 1’s family’s home in May 2020 while in possession of a bulletproof vest. As the Criminal Complaint explains, the defendant sent Victim 1’s representatives multiple threatening messages in the early morning hours of February 11, 2022. In these messages, the defendant threatened to kidnap and injure Victim 1 and Victim 1’s representatives. The United States respectfully requests that, should a hearing be necessary, the Court grant the United States a continuance in this matter of three days so that the United States may adequately prepare for the hearing on this motion.

Respectfully submitted,

MARK H. WILDASIN
United States Attorney

By: /s/ Rascoe Dean
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served electronically to counsel for defendant via CM/ECF on the 1st day of April, 2022.

/s/ Rascoe Dean
RASCOE DEAN